

AUDUBON OF FLORIDA

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EXECUTIVE OFFICE

August 16, 2001

Mr. Henry Dean
Executive Director
South Florida Water Management District
3301 Gun Club Road
West Palm Beach, FL 33406

Subject: Aquifer Storage and Recovery Pilot Projects,
Comprehensive Everglades Restoration Plan

Dear Mr. Dean:

On behalf of Audubon of Florida, I am writing regarding our position on Aquifer Storage and Recovery (ASR) Pilot Projects associated with the Comprehensive Everglades Restoration Plan (CERP). Audubon supports the expeditious development, monitoring and evaluation of the ASR pilot projects and the ASR regional study. These projects are necessary to address the many significant concerns raised concerning this technology, including those raised by the National Academy of Sciences and the South Florida Ecosystem Restoration Task Force. Additionally, Audubon strongly supports the development of an Aquifer Management and Protection Plan, as well as contingency plans to account for potential ASR shortfalls.

Aquifer Management and Protection Plan Must Be Developed

As recommended by the Governor's Commission for a Sustainable South Florida, the South Florida Water Management District, in conjunction with the US Environmental Protection Agency and the US Army Corps of Engineers, "should develop an Aquifer Management and Protection Plan for the Floridan Aquifer. This plan should consider existing and proposed ASR facilities, existing permitted withdrawals for water supplies, potential artesian wells to support Biscayne Bay, and potential contamination from treated wastewater discharged through deep well injection."¹

Contingency Plans Must Be Developed

Although we realize the potential for ASR to provide great benefits, Audubon strongly recommends the development of contingency plans to accommodate potential component performance shortfalls and delays in implementation. Contingency plans should be developed as part of the individual pilot projects and the regional study. If the ASR projects do not perform as anticipated, it will be necessary to have well-designed contingency plans ready for immediate implementation.

¹ Governor's Commission for a Sustainable South Florida, Report on the January 25, 1999 Draft Implementation Plan of the C&SF Project Restudy (March 3, 1999), at 2.



A STRATEGIC ALLIANCE OF THE FLORIDA AND NATIONAL SOCIETIES IN PARTNERSHIP WITH 45 LOCAL AUDUBON CHAPTERS



Address Concerns of the National Academy of Sciences Concerns

We support the conclusions of the National Academy of Sciences Committee on Restoration of the Greater Everglades Ecosystem (CROGEE), as articulated in the recently released *Aquifer Storage and Recovery in the Comprehensive Everglades Restoration Plan: A Critique of the Pilot Projects and Related Plans for ASR in the Lake Okechobee and Western Hillsboro Area*. The CROGEE concluded that:

1. regional analysis of the subsurface is crucial to evaluating the potential for success for CERP ASR components,
2. biogeochemical reactions in the subsurface and the potential impacts on receiving water bodies at the surface require further investigation and understanding, and
3. thorough monitoring and testing at pilot project sites is necessary to provide data to the referenced regional and water quality investigations.

Address the Concerns of the South Florida Ecosystem Restoration Task Force

We support the recommendations given by the Aquifer Storage and Recovery Issue Team of the South Florida Ecosystem Restoration Task Force as articulated in its July 1999 report to the South Florida Ecosystem Restoration Working Group. The team recommended further analyses of several technical issues relating to ASR implementation, including:

1. characterization of the quality of prospective source waters, spatial and temporal variability,
2. characterization of regional hydrogeology of the Upper Floridan Aquifer: hydraulic properties and water quality,
3. analysis of critical pressure for rock fracturing,
4. analysis of site and regional changes in head and patterns of flow,
5. analysis of water quality changes during movement and storage in the aquifer,
6. Aquifer Storage and Recovery potential effects on mercury bioaccumulation for ecosystem restoration projects, and
7. relationship between ASR storage interval properties and recovery rates and recharge volume.

There are many significant concerns that must be addressed prior to the full-scale implementation of the ASR components described in the CERP. The pilot projects and the regional study should address all of the technical concerns relating to ASR. This will prevent unnecessary impacts to the environment and existing water users that could result from improper implementation of ASR.

Continue Open and Informed Public Process

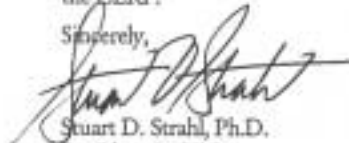
As stated at the August 2, 2001, Water Resource Advisory Commission meeting, implementation of the CERP ASR pilot projects is proceeding in a slow, methodical manner to answer the many questions concerning ASR. We understand that the US Environmental Protection Agency is committed to working with the State of Florida on its efforts towards the development of ASR project that are protective of human health and the environment and are beneficial to the State. The failed ASR legislation from the 2001 Florida Legislative session was unnecessary for the implementation of the CERP ASR Pilot Projects, and served as a distraction from the real issues that must be addressed through the pilot projects and the regional study.

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Audubon strongly recommends that the CERP implementation process continue to be as open, inclusive and informed as possible at every stage to ensure a plan that continues to enjoy the broadest public support. Public outreach efforts must be active efforts to fully inform and engage all stakeholders. Special attention must be given to environmental justice issues and the concerns of minority communities around Lake Okeechobee. Additionally, all decisions regarding the implementation of ASR should be made in consideration of public comment. There are real concerns regarding large-scale implementation of ASR that must be acknowledged and addressed if we are to successfully implement the CERP.

Sincerely,



Stuart D. Strahl, Ph.D.
President & CEO